

Intercontinental Terminals Company (ITC) Fire Update Deer Park, Texas April 7, 2019 0000 – April 7, 2019 1159

Incident Management Objectives:

Objective 1: Ensure the health and safety of the public and response personnel.

Objective 2: Establish an incident management structure and processes employing the Incident Command System to enable effective overall management of the event with deployment of resources (staff and equipment) in a rapid, focused and well-coordinated manner.

Objective 3: Encourage a collaborative federalism approach, where Federal, State, Tribal, and local governments interact cooperatively and collectively to solve common problems.

Objective 4: Take actions to assess the on-site and off-site impacts during the emergency response phase of this incident. Provide this information to state and local authorities to assist them in their decision to protect the local citizens.

Objective 5: Conduct activities to prevent off-site releases from the ITC Tank Farm.

Objective 6: Respond to, mitigate and recovery off-site releases from the ITC Tank Farm.

Objective 7: Maintain open communication with Regional management

Incident Overview:

On March 17, 2019, an above ground storage tank containing Naphtha, caught fire at the Intercontinental Terminal Company (ITC), LLC facility in Deer Park Texas. The ITC facility consists of 15 80,000-barrel capacity above ground storage tanks containing petroleum products including Naphtha, Xylene, Toluene, Gasoline Blendstock, and Base Oil. Eleven of the 15 80,000-barrel capacity above ground storage tanks on site were involved in the fire, resulting in the release of contaminants into the atmosphere, as well discharging the contents of the tanks to drainage pathways. Firefighting water and foam potentially containing petroleum products were released from an outfall due to accumulation of water from firefighting efforts. Various firefighting organizations assisted in putting out the fire utilizing a variety of firefighting foams.

A partial breach of the tank farm containment wall on the northeast side near Tank 80-7 occurred at approximately 12:00 pm on March 22, 2019, to the ditched area and into Tucker Bayou. Additional boom was placed along the ditch leading to Tucker Bayou and Buffalo Bayou (Houston Ship Channel). The Responsible Party's contractor has rebuilt the containment wall using clay material.

At approximately 3:40 pm on March 22, 2019, three tanks reignited. The fire spread from the containment area through the breached containment wall into the ditch along Tidal Road. Foam was applied to the tanks and the ditch to extinguish the fire.

As a result of the fire, nine of the fifteen oil tanks had been burned and collapsed. One of the tanks had been burned and damaged, but not completely collapsed. Two tanks had become overheated and smoked but were not significantly damaged. Four of the tanks had smoked but did not burn.

During and after the fire and the breach of the secondary containment, several readings of benzene above 1.0 ppm were detected (highest was 16.5 near National Tank Services) by the various entities conducting air monitoring through the afternoon and night. These readings were located along the ship channel.

A vessel decontamination plan was approved on March 27, 2019. The plan established procedures for decontamination of large and small vessels. Also, the plan describes how the decontamination team will utilize resources that include barge boats equipped with a hot water pressure washer, support boats for assessment team members, containment boom and absorbent sweep, rags, absorbent pads, cleaning agents, personal protective equipment (PPE), boat operators, and technicians.

On March 31, 2019, EPA and the Texas Commission on Environmental Quality (TCEQ) posted the Story Map Resource Interactive tool for the ITC incident. The Story Map provides easy access for ITC fire data.

Executive Overview:

Land Operations:

- On April 7, 2019, ITC received permission from TCEQ to start re-circulating the waste water treatment process without discharging any water.
- On April 7, 2019, ITC started degassing tank 80-13 and continued degassing tanks 80-14 and 80-15 using a thermal oxidizer to decrease off-gassing, and continued sludge break-up operations for tank 80-15.
- ITC continues to drain Tanks 80-5 and 80-8 into Vac Trucks for transport to designated tanks for future disposal. The tanks are anticipated to be pumped down with residual amounts remaining by April 8, 2019.
- On April 7, 2019, ITC continued to conduct cleaning operations on Tanks 80-2 and 80-3.
- ITC continues applying foam to the tanks and tank farm area as needed.

Tank Status	Tank No.
Complete*	80-2, 80-3, 80-7, 80-9, 80-10, 80-12, 80-13, 80-14, 80-15
Standby	80-1, 80-4, 80-5, 80-6, 80-8, 80-11

^{*}The tank status are estimates provided by ITC based on thermal imaging calculations. The tanks with complete status may have residual products and/or may be partially refilled by overspray, foam, or containment water due to other tank operations.

Water Operations:

- ITC continued 24-hr water skimming and flushing operations at Tucker Bayou on April 7, 2019. The four layers of 18"-boom located north of the Dow Bridge were removed at 9:00 to divert product to Marco boat skimmers located at confluence of Tucker Bayou at the Houston Ship Channel. Flushing and skimming operations ceased at 1000 due to inclement weather.
- At approximately 3:00 pm on April 7, 2019, EPA and TCEQ visually assessed Tucker Bayou to determine storm impacts in response to a closure of the Houston Ship Channel. A slight sheen of product was observed outside the 46"-boom located at the confluence of Tucker Bayou and the Houston Ship Channel. Most of the product from Tucker Bayou had remained contained within the secondary and tertiary 18"-boom.
- Due to severe weather, EPA did not conduct surface water sampling on April 7, 2019. The surface water samples previously collected along Buffalo Bayou and the San Jacinto River and were analyzed for per- and polyfluoroakyl substances (PFAS), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), chemical oxygen demand (COD), and oil & grease. The results from the sampling event were compared to the TCEQ Surface Water Quality Standards (WQS), or to TCEQ Texas Risk Reduction Program surface water protective concentration levels (PCLs), if a WQS was not available for a chemical. On March 21, 2019, the surface water sample collected at the confluence of Tucker Bayou and Buffalo Bayou (BB-02) exceeded the PCL for oil and grease, and the WQS for naphthalene, benzene and total xylenes. On March 25, 2019, the surface water sample collected on Buffalo Bayou at the Battleship Texas (BB-05) exceeded the PCL for oil and grease. On April 2, 2019, the surface water sample collected on Buffalo Bayou at the Battleship Texas (BB-05) exceeded the WQS for 2-methylnaphthalene and phenanthrene. No other exceedances have been observed.
- The United States Coast Guard (USCG) Captain of the Port continues the controlled open for the Ship Channel, with traffic during the daytime only. Decontamination vessels are being positioned to help ships that may have residue on the hulls.
- As of Friday, April 7, 2019:
 - 147,300 feet of boom deployed
 - o 110,070 bbl of product/water recovered from water operations
 - o 153,980 bbl of product/water recovered from tank farm
 - Approximately 465,000 gallons of foam concentrate used for firefighting/suppression and emission suppression

Total Vessels as of April 7, 2019						
Work Boats	Barges	Small Capacity Skimming Vessels	Skimmers	Total Vessels		
109	100	25	119	353		

Community Air Monitoring:

- On April 7, 2019, the daytime air strike team (EPA, TCEQ, and ITC) returned to the Southwest Shipyard due to benzene being detected at 1.0 ppm. The team reported that a plume was coming from shipyard. TCEQ has been notified and will follow up.
- Several entities including TCEQ, EPA, and ITC continue to conduct air monitoring around the tank farm, in adjoining industrial areas, and communities downwind from the facility.
- EPA conducted handheld air monitoring on April 7, 2019, from 00:00 to 23:59 at 61 locations in the surrounding communities. Results were reported above the detection limit at two locations for total VOCs and at one location for benzene. Benzene was detected above the TCEQ short-term Air Monitoring Comparison Value (AMCV) (0.18 ppm). EPA will continue to conduct additional air monitoring and deploy the Trace Atmospheric Gas Analyzer (TAGA) to determine if VOCs continue to be detected.

- TCEQ continued handheld air monitoring on April 7, 2019 in the surrounding communities, from 12:00 am to 11:59 pm; no readings above the Unified Command action level were detected.
- The Airborne Spectral Photometric Environmental Collection Technology (ASPECT) aircraft did not fly during this reporting period due to maintenance. The aircraft will return when weather conditions are suitable.
- EPA conducted air sampling using the Trace Atmospheric Gas Analyzer (TAGA) on April
 7, 2019. The TAGA analyzed the air samples for benzene, toluene and xylene. The
 TAGA air sampling results were compared to the TCEQ short-term AMCVs and found no
 exceedances of the short-term AMCVs. These results have been shared with unified
 command and local officials.

Coordination with State Agencies:

On March 17, 2019, in response to a tank fire at the ITC, federal, state and local agencies joined ITC in a Unified Command. Multiple agencies including the United States Coast Guard, the TCEQ, and Harris County Pollution Control Services supported the response effort.

EPA Resources:

Personnel	EPA R6 Dallas	ITC Deer Park	Total
EPA Region 6	11	6	17
EPA Non-Region 6	0	3	3
START	1	19	20
Other Contractors	0	3	3
Total	12	31	43

Additional Information: Air Monitoring and Water Sampling locations.

